RECD 11-27-95
F.B.

Regional Remediation Team

ciba

Ciba-Geigy Corporation
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November 20, 1995

Timothy M. O'Connor, Supervising Engineer
Division of Site Remediation
Rhode Island Department of Environmental Management
291 Promenade Street
Providence, Rhode Island 02908

RE: CIBA-GEIGY SEDIMENT REMOVAL INTERIM REMEDIAL MEASURE ACCIDENTAL DISCHARGE TO RIVER

Dear Mr. O'Connor:

As you are aware, Ciba is currently conducting an Interim Remedial Measure (IRM) at the Cranston Facility in the Pawtuxet River, which specifies that the former Cofferdam Area be contained within sheet piling before the excavation of contaminated sediments commences.

On November 17, 1995 at 9:35 A.M., during the installation of the sheet piling, a pressurized hydraulic line on the vibratory hammer ruptured. Approximately five (5) to ten (10) gallons of hydraulic fluid were spilled into the Pawtuxet River adjacent to the Site. Operations were halted immediately, and the vibratory hammer taken out of service. The majority of the material was spilled within the confines of the existing protective silt curtain. Although sorbent booms were placed within the silt curtained area, an oil sheen was evident and some oil did flow downstream.

Due to the fact that this work was to be conducted in and around the river, a special non-toxic, fully biodegradable hydraulic fluid was specified in the IRM Work Plan. The material is Chevron Clarity Hydraulic Oil AW-46 (see Attached MSDS). It is a non-toxic biodegradable mineral oil fluid. Small quantity releases into the environment would not pose a significant risk to the environment.

The hydraulic line of the vibratory hammer was repaired and site operations resumed at approximately 2:30 P.M.

Doris Aschman of your office was notified of the incident at approximately 10:00 A.M. As per her instructions, this letter constitutes a follow up report. Should you require additional information, please contact Michael Goodman of my staff (401) 461-2351 or (908) 914-2730.

Sincerely,

Barry J. Berdahl, Ph.D., C.H.M.M.
Regional Compliance Manger

c: F. Battaglia, USEPA-Region I

Chevron
Lubricants

Chevron Clarity® Hydraulic Oils AW

ISO 32, 46, 68

Features

Chevron Clarity Hydraulic Oils AW are designed to give maximum protection to hydraulic pumps in environmentally sensitive areas. They are formulated from severely hydrotreated mineral oils and ashless additives that provide superior oxidation stability, water separability, foam suppression, and protection against wear, rust and corrosion. They are designed to match or exceed the performance requirements of conventional antiwear hydraulic oils while providing an additional level of safety in case of leaks or incidental discharge to the environment.

Functions

Many hydraulic systems are required to operate in areas where leaks or spills of hydraulic fluid may result in contamination of the soil or nearby waterways. Conventional antiwear hydraulic oils are formulated with metal-containing performance additives which will persist in the environment in the event of leaks. Recently introduced vegetable hydraulic oils meet the environmental requirements, but fall short of the performance requirements. The ashless formulation of Chevron Clarity Hydraulic Oils AW passes the acute aquatic toxicity (LC-50) criteria adopted by the U.S. Fish & Wildlife Service and the U.S. EPA. Additionally, this mineral oil based formulation is inherently biodegradable, minimizing long term environmental concerns.

Chevron Clarity Hydraulic Oils AW are long-life lubricants, with dramatically longer TOST lives than conventional hydraulic fluids. This results in the environmental benefit of using fewer natural resources as well as the customer benefit of reduced maintenance with the corresponding savings. Additionally, the mineral oil nature of these lubricants allows them to be used in established oil recycling programs, unlike the vegetable hydraulic oils.

Applications

Chevron Clarity Hydraulic Oils AW are designed for use in the vane-, piston-, and gear-type pumps of mobile and stationary hydraulic equipment situated in environmentally sensitive areas. The antiwear performance of these oils make them especially suited where pressures exceed 1000 psi. Chevron Clarity Hydraulic Oils AW meet or exceed the bench test requirements of Denison HF-1 and HF-2A, Cincinnati Milacron P-68, P-69, and P-70, and Vickers 1-286-S.

Customer Benefits

PROVEN ENVIRONMENTAL BENEFITS. The severely hydrotreated mineral oil and ashless formulation passes the stringent acute aquatic toxicity (LC-50) test and is inherently biodegradable. The mineral oil formulation is suitable for conventional recycling programs.

SUPERIOR OXIDATION STABILITY. Longer service life than conventional antiwear hydraulic oils or vegetable hydraulic oils.

EXCELLENT ANTIWEAR PROPERTIES. In ASTM D 2882 Vickers pump test, typical weight loss from vanes and ring is 18 mg.

PREMIUM PERFORMANCE. Ashless formulation meets or exceeds pump manufacturer's requirements for viscosity, rust and corrosion protection, hydrolytic stability, water separability, foam inhibition, and filterability.

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Chevron U.S.A. Products Company